

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Jalen Martez Richardson,  
D-2 Jonathan Marquise Richardson,  
D-3 Davon Marcelis Davis, and  
D-4 Christopher Mark Richardson Jr.

Case No.

Case: 2:25-mj-30436

Assigned To : Unassigned

Assign. Date : 7/8/2025

Description: RE: CHRISTOPHER  
RICHARDSON JR. (EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2025 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2118(b) &amp; 2

Entering the premises of a DEA-registered pharmacy with the intent to  
steal controlled substances, Aiding and Abetting.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: July 8, 2025City and state: Detroit, MI*Complainant's signature*

Robert J. Schmitz, Special Agent, FBI

*Printed name and title**Judge's signature*

Hon. David R. Grand, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Robert J. Schmitz, assigned to the FBI Violent Crime Task Force, being duly sworn, hereby state:

**INTRODUCTION AND BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 2016. I am currently assigned to the FBI Detroit Violent Crime Task Force (VCTF). This task force consists of law enforcement officers from several police departments including the Detroit Police Department, Dearborn Police Department, Canton Police Department, Westland Police Department, Detroit Public Schools Community District Police Department, and the Livonia Police Department as well as the Michigan Department of Corrections (MDOC).

2. I have conducted or assisted in numerous investigations of federal violations, including crimes of violence, firearms, and drug trafficking. I have gained experience through training and everyday work related to these types of investigations. Through my training and experience, I am familiar with how pharmacies are authorized to dispense controlled substance through prescriptions. I am also aware that criminals oftentimes attempt to steal controlled substances from pharmacies for the purpose of later selling those stolen controlled substances.

3. I make this affidavit from personal knowledge based on my participation in this investigation, from information I learned from other law

enforcement personnel, including reviewing reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is provided for the limited purpose of establishing probable cause for a criminal complaint, and therefore does not include all information known to law enforcement related to this investigation.

4. I submit this affidavit in support of a criminal complaint and arrest warrants for Jalen Martez Richardson, Jonathan Marquise Richardson, Davon Marcelis Davis, and Christopher Mark Richardson Jr. for a violation of 18 U.S.C. § 2118(b) & 2 (entering the premises of a DEA-registered pharmacy with the intent to steal controlled substances, aiding and abetting).

#### **PROBABLE CAUSE**

5. In June 2025, law enforcement identified an individual known to law enforcement (hereinafter “Suspect One”) as the renter on two “Turo” vehicles that were identified as vehicles of interest in the attempted break-in of Keystone Pharmacy on May 24, 2025, in Novi, MI, and the break-in of Roc Pharmacy on June 12, 2025, in Rochester Hills, MI. Turo is a peer-to-peer online company based in San Francisco California, that allows private car owners to rent out their vehicles.

6. Both Keystone Family Pharmacy and Roc Pharmacy are licensed by the Drug Enforcement Administration (DEA) to dispense controlled substances.

7. On June 25, 2025, law enforcement learned that Suspect One used Turo to rent a white 2021 Chevrolet Blazer, VIN ending in S510688. Thereafter, law enforcement placed a GPS tracker on the white Blazer and surveillance was initiated by Canton Special Operations Group, Livonia Police Department Intelligence Bureau, Michigan State Police, and South Oakland Narcotics Intelligence Consortium (SONIC).

8. On the night of June 25, 2025, the white Blazer departed the area of 18502 Mount Elliot in Detroit and proceeded north on I-75. After exiting I-75, the white Blazer drove by pharmacies in the areas of Clarkston, Pontiac, and Bloomfield Township, MI.

9. The white Blazer eventually travelled to Novi Pharmacy, 39575 10 Mile Road, Novi, MI. Once the white Blazer arrived, it made several passes by the pharmacy before parking near the front door of the pharmacy. Law enforcement then observed three individuals exit the white Blazer and approach the front door of Novi Pharmacy. Law enforcement observed one of the individuals break the glass entry door to the pharmacy with a yellow crowbar. The three individuals then entered the pharmacy.

10. Less than one minute later, law enforcement converged on the pharmacy. The three individuals exited the pharmacy and attempted to flee on foot but were all apprehended by law enforcement. The driver of the white Blazer drove away and when fleeing, collided with an unmarked law enforcement vehicle. The

white Blazer fled southbound on the Lodge Freeway and proceeded to the area of Robinwood Street and Marx Street in Detroit where the driver abandoned the vehicle. The driver was located and taken into custody a short time later.

11. The three arrestees who broke into the pharmacy were identified as Jalen Martez Richardson (DOB: XX/XX/1993), Jonathan Marquise Richardson (DOB: XX/XX/1994), and Davon Marcelis Davis (DOB: XX/XX/1997).

12. The arrestee who fled the scene in the white Blazer was identified as Christopher Mark Richardson Jr (DOB: XX/XX/2004).

13. Novi Police processed the scene at Novi Pharmacy and observed two crowbars, one red and one yellow, in the parking lot. The cash register of the pharmacy had been pried open with yellow tool markings observed on the register's drawer. Medications and bags were observed on the ground.

14. After Jonathan Marquise Richardson was taken into custody outside of the pharmacy, law enforcement located \$404 on his person. Law enforcement determined that this cash was taken from Novi Pharmacy's cash register.

15. While fleeing on foot, Davon Marcelis Davis was carrying a black garbage bag in his right hand. Loud verbal commands were given to Davis to stop and get on the ground. Davis threw the garbage bag before ultimately surrendering to law enforcement. The black garbage bag contained both controlled and non-controlled medications. The controlled substances recovered from the black garbage bag included 90 tablets of Alprazolam (1mg) and 30 tablets of Adderall

(20mg). Alprazolam is a Schedule IV controlled substance. Adderall is a Schedule II controlled substance.

16. Novi Pharmacy is licensed by the DEA to dispense controlled substances.

### **CONCLUSION**

17. Based on the above information, there is probable cause to believe that Jalen Martez Richardson, Jonathan Marquise Richardson, Davon Marcelis Davis, and Christopher Mark Richardson Jr violated 18 U.S.C. § 2118(b) & 2 (entering the premises of a DEA-registered pharmacy with the intent to steal controlled substances, Aiding and Abetting) by entering the Novi Pharmacy on or about June 25, 2025, without authority, with the intent to steal controlled substances having a replacement cost of more than \$500 and by using a rental vehicle, which is a facility in interstate commerce, to facility the entry.

Respectfully submitted,



Robert J. Schmitz, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



Honorable David R. Grand  
United States Magistrate Judge

Date: July 8, 2025